

Memorandum

To: Columbus FMGP Site File
From: Todd H. Davis, RPM *THD*
Date: April 14, 2010
Through: Pradip Dalal, SUPR *PD*
Gregory McCabe, ENSV *GM*
Dan Nicoski, ENSV *DN*
RE: Preliminary Remediation Goals (PRG) for Soil

Follow-up discussions over the phone have occurred between the EPA and the PRPs regarding the depth to which contaminated soil must be removed: at the FMGP Site, off-site on the public right-of-way, and off-site on the privately owned residential property adjacent to the site. After consideration, EPA has determined that soils at the FMGP site containing contaminants of concern (COC) above the Preliminary Remediation Goals (PRG) at the 1×10^{-6} risk level shall be removed to a depth of 10 feet below ground surface (bgs). FMGP site soils that contain COCs above the PRGs at the 1×10^{-5} risk level shall be removed from 10 feet bgs to the top of the groundwater table or 15 feet bgs. Institutional Controls (IC), under an instrument pursuant to the Nebraska Uniform Environmental Covenants Act, shall be used to limit future uses of the FMGP site and inform potential future owners of any contamination left at the FMGP site including contaminated soils left under building structures.

Off-site soils containing COCs above the PRGs at the 1×10^{-6} risk level shall be removed to a depth of 10 feet bgs. Off-site soils containing COCs above the PRGs at the 1×10^{-6} risk level at a depth greater than 10 feet bgs may be left in place with the use of ICs. Institutional Controls, under an instrument pursuant to the Nebraska Uniform Environmental Covenants Act, shall be sought to limit future exposure to those soils and inform potential future owners of any contamination left in place.

Soils at the site, below 10 feet bgs, containing COCs above the PRGs at the 1×10^{-5} risk level shall be removed to protect the groundwater from further contamination. Soil at the site has the greatest potential to be contaminated by the historic use of the site as a manufactured gas plant and preventing additional contamination of the groundwater, if feasible, is required. The groundwater is used by the City of Columbus as a drinking water source though groundwater modeling has shown that the contamination plume from the FMGP site should not be drawn into the extraction wells used by the 10th Street Superfund Site. Treated water from the 10th Street extraction wells is used as a source of drinking water for the City of Columbus. To prevent the potential intake of the contamination plume into the extraction wells, monitoring wells are in place to monitor the potential migration of the contamination plume.

The Columbus Institutional Control Area (CICA) is in place to prevent human exposure to contaminated groundwater due to the presence of the 10th Street Superfund Site. The use of the CICA prevents the groundwater to human pathway for contaminated groundwater. The Columbus FMGP Site is within the boundaries of the CICA.

